



SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

DONNA A. CANFIELD
Assistant Corporation Counsel
Phone: (212) 356-2461
Fax: (212) 356-2438
dcanfiel@law.nyc.gov

June 23, 2022

BY: ECF

Honorable John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street, Room 1320
New York, New York 10007

Re: *Kaye v. NYC Health & Hospitals Corp. et al.*, 18-cv-12137 (JPC)(JLC)

Dear Judge Cronan:

I am an Assistant Corporation Counsel in the office of Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for defendants the New York City Health and Hospitals Corporation (“H+H”), Elizabeth Ford, Patricia Yang, Abhishek Jain, and Jonathan Wangel, in the above-referenced matter. With the consent of plaintiff’s counsel, I write to respectfully request a one-week extension of time, from June 24, 2022 to July 1, 2022, to file defendants’ reply to plaintiff’s opposition to summary judgment. This is defendants’ first request for an extension of time.

As an initial matter, counsel for the defendants acknowledges that this request for an extension has not been made within 48 hours as required by Your Honor’s Individual Rules and Practices, and I apologize in advance for any trouble this belated request may cause the Court. This request for an extension is sought, however, due to plaintiff’s extensive response to Defendants’ Rule 56.1 Statement, and the necessity to address all the issues raised.

Defendants thank the Court in advance for its consideration of this request.

Respectfully submitted,

ECF /s/

Donna A. Canfield
Assistant Corporation Counsel
dcanfiel@law.nyc.gov

cc: Special Hagan (by ECF)